

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**CERTIFIED MEASUREMENT, LLC,**

**Plaintiff**

**vs.**

**CENTERPOINT ENERGY HOUSTON  
ELECTRIC, LLC, and ITRON, INC.,**

**Defendants.**

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**Civil Action No. 2:14-cv-627**

**DECLARATION OF MICHAEL CADIEUX IN SUPPORT OF  
DEFENDANTS' MOTION TO TRANSFER VENUE TO THE HOUSTON DIVISION OF  
THE SOUTHERN DISTRICT OF TEXAS**

I, Michel Cadieux, declare:

1. I make this declaration in support of Defendants' Motion to Transfer Venue on the basis of personal knowledge, and if called to testify as a witness, I would and could testify competently hereto.

2. I am Senior Vice President of Human Resources for Defendant Itron, Inc. ("Itron"). I have personal knowledge of the facts herein unless otherwise indicated.

3. Itron is a leading technology and services company dedicated to the resourceful use of energy and water. Among other products, Itron develops and sells electric meters and equipment and services relating to communications with those meters. Itron employs more than 8000 people around the world and has approximately 8000 customers.

4. I understand that Plaintiff, Certified Measurement, LLC, alleges that Itron's OpenWay® CENTRON® meter and OpenWay® architecture infringes U.S. Patent Nos. 5,828,751; 6,282,648; 6,289,453; and 8,549,310.

5. Itron's OpenWay® CENTRON® meters and the OpenWay architecture are marketed and sold nationwide. By way of example only, the OpenWay® CENTRON® meter is used by the following utilities in the United States:

- a. San Diego Gas and Electric (Headquarters: San Diego, CA)
- b. Southern California Edison (Headquarters: Rosemead, CA)
- c. DTE Energy (Headquarters: Detroit, MI)
- d. Glendale Water and Power (Headquarters: Glendale, CA)
- e. National Grid (Headquarters: London, UK)
- f. First Energy (Headquarters: Akron, OH)
- g. Duke Energy (Headquarters: Charlotte, NH)
- h. Duquesne Light Company (Headquarters: Pittsburgh, PA)
- i. CenterPoint (Headquarters: Houston, TX)

6. Itron is a Washington corporation and has its headquarters in Liberty Lake, Washington. Itron has offices in other states in the United States, but has no offices in the State of Texas.

7. Itron's accused electric meters are manufactured in Oconee, South Carolina.

8. Based on our business records, of Itron's more than 8000 employees, a total of about 22 reside in the State of Texas. At least four of them work with CenterPoint in the Houston area. The remaining work out of their homes. Of those, I understand only six reside in the Eastern District, and all of them in Collin and Denton counties in the Sherman division. I understand that no Itron employee resides in the Marshall division.

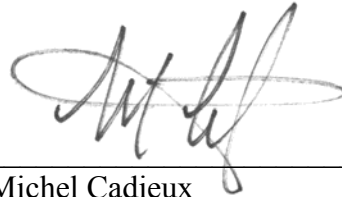
9. In the United States, the persons most knowledgeable regarding the sales and marketing of the accused meters and architecture reside and work in the Liberty Lake, Washington area. The persons most knowledgeable regarding the design, development and functionality of the meters reside and work in the Liberty Lake or Oconee, South Carolina areas.

To the best of my knowledge, there are no material witnesses, whether Itron employees or not, in the Eastern District of Texas.

10. In terms of travel, it is much more convenient for Itron witnesses to fly to Houston than to travel to Marshall. There are more flights available to Houston as compared to Shreveport, which I understand is the closest airport to Marshall. Also, in Houston, there is the opportunity to combine travel related to the litigation with meetings with CenterPoint. There is no business or other reason Itron employees need to be in Marshall.

**I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.**

EXECUTED this 25th day of July, 2014.

A handwritten signature in black ink, appearing to read 'Michel Cadieux', is written over a horizontal line.

Michel Cadieux